IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Dana Valley)	Chapter 13
Lorie Valley)	Case No. 1:18-bk-00968-HWV
Pacific Union Financial, LLC	Debtors)	
)	
)	
	Movant)	
)	
v.)	
)	
Dana Valley and Lorie Valley	,)	
	Respondents)	
Charles DeHart, III, Trustee)	

DEBTORS' RESPONSE TO MOTION OF PACIFIC UNION FINANCIAL, LLC MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001

- 1. Movant, Pacific Union Financial, LLC, filed its Motion for Relief from Stay on August 21, 2018.
 - 2. Debtors acknowledges some mortgage payments are past due.
 - 3. Debtors desires the opportunity to cure any post-petition mortgage arrears and keep their home.
 - 4. Debtors requests the Court deny Movant's Motion for Relief.

WHERFORE, Debtors, Dana and Lorie Valley, pray the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed on August 21, 2018 by Pacific Union Financial, LLC.

Dated: September 4, 2018 Respectfully Submitted,

/s/Stephen Wade Parker Stephen Wade Parker (315606) Counsel for Debtors Mooney & Associates 2 S. Hanover Street Carlisle, PA 17013 Swp@mooney4law.com (717) 243-4770 Phone (717) 632-3612 Fax